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**CH2MHILL**

March 28, 2011

277085.32.D2.03/MID3.4026

Ms. Janet Naito  
California Environmental Protection Agency  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2721

Subject: Request for No Further Action for Solid Media at Polychlorinated Biphenyl  
Site Building 84A UL#01, Investigation Area D1.3, Lennar Mare Island,  
Vallejo, California

Dear Ms. Naito:

CH2M HILL submitted a request for no further action (NFA) at Polychlorinated Biphenyl (PCB) Site Building 84A UL#01 on October 28, 2004, in a report titled, *Summary Report for Site Characterization and Removal Action for Polychlorinated Biphenyls at Building 84A, Investigation Area D1, Mare Island, Vallejo, California* (Summary Report) (CH2M HILL 2004). The report provided results of site characterization and a removal action associated with PCB Site Building 84A UL#01. In a letter dated October 22, 2009, the State of California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), requested collection of indoor air PCB samples in Building 84A for analysis of total PCBs because of indoor air PCB concerns in adjacent Building 84 (DTSC 2009). Indoor air samples were collected in Building 84A for PCB analysis in February 2011 in accordance with the *Draft Indoor Air Sampling and Analysis Plan for Polychlorinated Biphenyl Sites at Lennar Mare Island* (CH2M HILL 2005). Indoor air PCB sample results will be reported in a separate submittal. This letter addresses solid media at PCB Site Building 84A UL#01.

As stated in the Summary Report (CH2M HILL 2004), in February 1995, personnel from Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment (SSPORTS), collected concrete, tile, and metal samples from PCB Site Building 84A UL#01. Figure 2-1 (this figure is copied from the 2004 Summary Report) references the locations of solid and wipe samples. Because analytical data for some of the samples (4257-0071 and 4357-0072) were not located in the Navy files, CH2M HILL collected additional samples for laboratory analysis in April 2004 to replace the missing sample results. In addition, CH2M HILL collected one metal wipe sample from the approximate location where previous sample 4357-0073 had been collected because the units reported in the SSSPORTS results (milligrams per kilogram [mg/kg]) did not correspond with the medium (i.e., PCB samples for metals analyses are usually collected as wipe samples and reported in micrograms per 100 square centimeters).

PCBs were not detected at concentrations above the laboratory reporting limit in the CH2M HILL metal wipe sample collected in 2004. CH2M HILL personnel found no visible evidence in April 2004 that SSPTS collected solid samples from the metal at PCB Site Building 84A UL#01.

In addition, as stated in the Summary Report (CH2M HILL 2004), CH2M HILL performed a concrete removal action for a portion of the floor at PCB Site Building 84A UL#01 in September 2004. After the removal action, three soil verification samples were collected. Total PCB concentrations in the verification samples were less than the 0.22 mg/kg, which is the United States Environmental Protection Agency (USEPA) residential preliminary remediation goal (PRG) level for high-risk PCBs in effect at the time (USEPA 2002). Figure 3-1 from the Summary Report, provided at the end of this letter, shows the approximate concrete removal area and verification sampling locations and the verification sample results.

The conditions for DTSC closure for PCB concentrations in solid media in a residential setting have been satisfied at this site. Because the total PCB concentrations in remaining samples of floor materials and verification soil samples are below the USEPA residential regional screening level for high-risk PCBs of 0.22 mg/kg, the current screening level at PCB Site Building 84A UL#01, an NFA determination for solid media at PCB Site Building 84A UL#01 would be protective of human health and the environment. On the basis of these results, CH2M HILL requests DTSC concurrence that NFA is appropriate for residential reuse for solid media at PCB Site Building 84A UL#01.

Please submit your response to Stephen Farley at the above address or via email at [Stephen.Farley@CH2M.com](mailto:Stephen.Farley@CH2M.com). If you have questions regarding the PCB site addressed in this letter, please contact Jennifer Lindquist at 530/229-3224 or Stephen Farley at 707/554-8157.

Sincerely,

CH2M HILL



Jennifer Lindquist  
Project Manager



Stephen M. Farley, P.G.  
Senior Technical Consultant

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ES030211203204RDD

Enclosures: Summary Report Figures 2-1 and 3-1

## References

- CH2M HILL. 2004. *Summary Report for Site Characterization and Removal Action for Polychlorinated Biphenyls at Building 84A, Investigation Area D1, Mare Island, Vallejo, California*. October.
- \_\_\_\_\_. 2005. *Draft Indoor Air Sampling and Analysis Plan for Polychlorinated Biphenyl Sites at Lennar Mare Island*. November.
- State of California Environmental Protection Agency, Department of Toxic Substances Control (DTSC). 2009. Letter. "Lennar Mare Island, Summary Report for the Site Characterization and Removal Action for Polychlorinated Biphenyls at Building 84A, Investigation Area D1, dated October 28, 2004." October 22.
- United States Environmental Protection Agency (USEPA). 2002. Region 9 Preliminary Remediation Goals. <http://www.epa.gov/region09/waste/sfund/prg/index.htm>. October 1.
- \_\_\_\_\_. 2010. *Regional Screening Levels for Chemical Contaminants at Superfund Sites*. [http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\\_table/index.htm](http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/index.htm). November.

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